

EXHIBIT 1

Barry Golden

From: Barry Golden
Sent: Friday, December 16, 2022 9:49 AM
To: Kristina Tyndall; Arthur Balder
Cc: Sarah Matz
Subject: RE: Balder v. Sarandon, et al / Meet and Confer Letter Re. Discovery

Mr. Balder,

Please dial in to the below number for our call at 10am.

Best Regards,

Barry Golden



Associate
Adelman Matz P.C.
P: [\(646\) 650-2207](tel:(646)650-2207) F: [\(646\) 650-2108](tel:(646)650-2108)
E: bgolden@adelmanmatz.com

From: Kristina Tyndall <kristina@adelmanmatz.com>
Sent: Friday, December 16, 2022 9:33 AM
To: Barry Golden <bgolden@adelmanmatz.com>; Arthur Balder <arthurbalderfiles@gmail.com>
Cc: Sarah Matz <sarah@adelmanmatz.com>
Subject: RE: Balder v. Sarandon, et al / Meet and Confer Letter Re. Discovery

I've sent a calendar invite with the following conference information:

Dial-in Number: +1 (267) 930-4000

Participant Access: 789 762 114

If you have any questions or concerns please let me know. Thank you

Best Regards,

Kristina Tyndall



Chief Executive Assistant
Adelman Matz P.C.
P: [\(646\) 650-2207](tel:(646)650-2207) F: [\(646\) 650-2108](tel:(646)650-2108)
E: kristina@adelmanmatz.com

From: Barry Golden <bgolden@adelmanmatz.com>
Sent: Thursday, December 15, 2022 8:54 PM
To: Arthur Balder <arthurbalderfiles@gmail.com>
Cc: Sarah Matz <sarah@adelmanmatz.com>; Kristina Tyndall <kristina@adelmanmatz.com>
Subject: RE: Balder v. Sarandon, et al / Meet and Confer Letter Re. Discovery

Mr. Balder,

Let's schedule the call for 10am. Kristina will circulate a dial in number to call. Moving forward, please remember to reply all on all emails.

Best Regards,

Barry Golden



Associate
Adelman Matz P.C.
P: (646) 650-2207 F: (646) 650-2108
E: bgolden@adelmanmatz.com

From: Arthur Balder <arthurbalderfiles@gmail.com>
Sent: Thursday, December 15, 2022 8:48 PM
To: Barry Golden <bgolden@adelmanmatz.com>
Subject: Re: Balder v. Sarandon, et al / Meet and Confer Letter Re. Discovery

It's very late for me, sorry. Between 9:30 am and 12:00 would be possible.

Regards

On Fri, Dec 16, 2022 at 2:20 AM Barry Golden <bgolden@adelmanmatz.com> wrote:

Mr. Balder,

Our office is available tomorrow at 3:30pm. Please let us know if that works for you.

Best Regards,

Barry Golden



Associate

Adelman Matz P.C.

P: [\(646\) 650-2207](tel:(646)650-2207) F: [\(646\) 650-2108](tel:(646)650-2108)

E: bgolden@adelmanmatz.com

From: Arthur Balder <arthurbalderfiles@gmail.com>

Sent: Thursday, December 15, 2022 8:11 PM

To: Barry Golden <bgolden@adelmanmatz.com>

Subject: Re: Balder v. Sarandon, et al / Meet and Confer Letter Re. Discovery

Mr Golden:

I disagree.

We can meet and confer as early as tomorrow, let me know a timeframe that works for you.

Regards,

Arthur

On Fri, Dec 16, 2022 at 1:25 AM Barry Golden <bgolden@adelmanmatz.com> wrote:

Dear Mr. Balder,

We write in an attempt to meet and confer with you to address a discovery issue that has arisen as a result of your recently issued subpoenas to Bryan Gibbs and Phillip's Auctioneers, LLC. The Federal Rules of Civil Procedure state that "[a] party may not seek discovery from any source before the parties have conferred as required by Rule 26(f), except in a proceeding exempted from initial disclosure under Rule 26(a)(1)(B), or when authorized by these rules, by stipulation, or by court order." As you are aware, no such discovery conference has been held. Accordingly, it is improper to conduct discovery at this time.

We therefore ask you to withdraw both subpoenas and agree that discovery is put on hold. Please let us know whether you agree and if not when you can meet and confer.

Best Regards,

Barry Golden



Associate

Adelman Matz P.C.

P: [\(646\) 650-2207](tel:(646)650-2207) F: [\(646\) 650-2108](tel:(646)650-2108)

E: bgolden@adelmanmatz.com

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